

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

Zhe Dong

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

FBI

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ NoU.S. DISTRICT COURT
DISTRICT OF MASS.

2020 JUN -5 PM 2:49

FILED
IN CLERK'S OFFICE

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Zhe Dong
240 Sidney Street #224
Cambridge
MA 02139
617 460 7105
zhe.dong15@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 09/16) Complaint for a Civil Case

Defendant No. 1

Name

FBI

Job or Title *(if known)*

Street Address

201 Maple St, Chelsea

City and County

Ches Chelsea

State and Zip Code

MA 02150

Telephone Number

857 386 2000

E-mail Address *(if known)*

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Civil Case

of limited jurisdiction (limited power). Generally, only two types of cases can be
 s involving a federal question and cases involving diversity of citizenship of the
 1331, a case arising under the United States Constitution or federal laws or treaties
 nder 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of
 ne amount at stake is more than \$75,000 is a diversity of citizenship case. In a
 ship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) The Dong, is a citizen of the
 State of (name) China.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
 under the laws of the State of (name) _____,
 and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of
 the State of (name) _____. Or is a citizen of
 (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) FBI, is incorporated under
 the laws of the State of (name) United States, and has its
 principal place of business in the State of (name) MA.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):

FBI persecute me and the compensation
I deserve is above \$ 75,000

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Statement of Claim:

① Ben Berners Lee was my English tutor from December 2017 to September 2018, we talked a lot, and he found that many of my speaking is similar with his father, Tim Berners Lee, an inventor of World Wide Web, a professor in MIT and professor fellow in oxford. Once when Ben and I met, I told Ben I was worried about my safety from Chinese government. The reason is: Chinese government organize protest about Peter Liang in 2016 in the U.S, I told people not join the protest in a weichat group. Ben told FBI my words. He also told FBI that many of my speaking is similar with his father. FBI confirmed that the people who organize protest is working for Chinese government based on my information. Meanwhile, FBI think me as a potential Chinese spy who want let Ben or his father like me by speaking something similar with Tim Berner Lee. But actually, it is common that the brains of people who are genius or potential genius share something in common, and it is common that they speak something similar, no matter where they come from, their age or gender. FBI never find evidence to prove me as a spy, but they persecute me, an innocent person.

② In December 13 2018, I went to FBI office because I am worried about my safety. FBI asked me many questions and treated me like a spy. But meanwhile they found my brain is valuable and use my brain's analysis information about Chinese spies, since FBI do not know how to analysis using public information. I read articles from Chinese medias and I found many Chinese spies in the US. FBI also steal information from my private gmail which I sent email to myself: I conclude that there are too much spies in the US beyond FBI imagine since FBI are not good at analysis even they have technology. FBI steal information from me and they get great great benefit based on that.

③ The U.S. owe me too much and also FBI owe me too much. I am FBI's benefactor. But look at what I get from FBI and the US? No appreciation, FBI use me and meanwhile persecute me. FBI are like schizophrenia. They monitor me, continually talk with Ben and Tim Berners lee about my personal privacy and twisting my words, which contributing Ben not contact with me. When I went to FBI to ask them(Jan 18th, 2020), FBI asked police to force me in hospitals for one week, in the hospitals, the nurses did not let me to call lawyer and emotionally abused me, and I was

forced to take medicines in a delicate way which I do not need to take. After I left the hospitals, my digestive system bleed because of the food or medicines in the hospitals. I went to look for Tim Berners Lee and would like to hear apology from him and his son, because when I was in the hospitals, his son who is important witness can testify to the doctors and prove that FBI persecute me, then doctors will allow me leave the hospitals, but Ben did not testify. I sent a letter to Tim Berner lee after I left the hospitals to ask questions :“How do you (and your son) feel? How much bleeding can jolt your conscience? How many days of abuse can touch your humanity? How much medicine forced to taken can call your morals?”, but he did not response, then I posted several letters in his department. Then FBI let MIT police to call me and threat to arrest me if I contact Tim again. After a few days I received medical bill from the hospitals and I went to MIT to talk with Tim. He was not in his office, and when I wanted to leave, MIT police arrested me (February 12th, 2020).They treated me badly. They asked me questions and I have right to keep silence, but they are not happy with my silence. One of the police hold my arm too tight and made me pain, I told him, he said “You do not answer questions”. Another time when they drive me to the court, I ask questions about court, he laugh at me “You do not answer questions”. I asked his name, he did not give me his name. When they put me in the police car, a male police press his body on my chest when he fasten my seat belt. This happens two times. I told the police they should let a female police to do fasten my seat belt, he said there is no women do this. When I was put in a room in Cambridge Police Department, I told the police to change to another room because the police can see me using toilet through the shared window. But the reject me, a police said you have no privacy here, you can see the camera. I said at least in another room I do not see your police see me through the windows when I use toilet. But I still get rejected. I felt too cold in the room and the police rejected to give me more blanket. (I was during women’s period at that day, but because of all these suffering, my period ended too much earlier then normal.) MIT police said I was trespass, then I found a lawyer and get this case dismissed and paid \$2500. I called MIT police, in 2.19.2020 ,FBI let Captain Martin talk with me in phone, he not let me go to MIT campus even I want to listen to MIT math classes. After some days, I called MIT police captain Martin again, I want to tell him the truth

(He do not know Tim speak similar with me and the US owe me too much), but FBI do not let him to answer my phone.

④

On Dec 13th, 2018, I told FBI I am worried about my safety, but FBI never tell me they guarantee my safety from Chinese government. Especially, after FBI steal from me and they get great benefit, my life is in a higher risk from Chinese government, FBI have duty to tell me how they guarantee my safety and my parents' safety. Furthermore, I applied for asylum to the homeland security in spring 2019, but they do not believe my story, FBI can prove my story is true, on June 18th, 2020, I went to FBI office, FBI rejected to help me, FBI even pretend not know the protest for Peter Liang is organized by Chinese government. FBI let me live in fear, I am afraid go to Chinese restaurants and Chinatown. When I go to Chinese restaurant or grocery store, I am always worried. When I am in my apartment, I still worry. For example, one night I heard there was sound outside, I was worried. When I went to my apartment to open my door, I worried because I do not know what I will see. I develop a habit to open light to sleep. Besides, I am worried about my parents' safety, I pray many times and hope God bless them.

⑤

In Feb 14th, 2020, I was sent to emergence room in a hospital because of my chest pain. My heart beats too fast or abnormal when I live under the condition of FBI persecuting me, but they continually cruelly persecute me which means that they intentional murder me. In Feb 14th, doctor said I have no heart attack, (Thank God). But if I continually live under FBI persecution, I will develop heart problem sooner or later. If I was murdered in delicate way by FBI, this world may never know the truth and no one may not care my justice. I can not imagine how sad my parents will be.

⑥

FBI let me live in hell. They personally get money, success, and honor from me, but they let me lose money, honor and health. My heart beats too fast or abnormal, my brain always pain heavily like there is a pliers squeezing my head, so I have to move to California in Feb 28, 2020, I wish I can be better there. In May 16, 2020, I come back to Boston. FBI let me live in sadness, angry, and fear. I can not study nomarly. I get a poor grade in spring semester 2020. I am worried that FBI monitor me, twist my words to persecute me in the future. I was planed go to German to study, but my study plan not finished because of my health condition, the professor reject to write a reference letter for me, my application not finished. I have to spent much time

to pray every day. I usually go to Mass general hospital to see doctor. But when I told one of the doctor FBI think me as a potential spy and monitor me, and the doctor write down my words in the hospital online medical record, the next time I went to see another doctor, that doctor, who can read my medical record online, treat me not good, she seems angry with me and rejected to give me medicine I need. I am afraid I can not go to mass general hospital to see doctor. I am considering change hospital. I planned to see dentist in mass general hospital, but I may have to change to other hospitals and I have not find a dentist.

Relief

1. I wish the evil people in FBI who persecute me get punished. Besides, the behaviors of FBI are beyond what human do, they are like animals, or even worse, since animals thank their own benefactor. FBI feel themselves smart when they steal from me, and they feel psycho pride when they tell other people to against me, even I was sent to emergence room. They are like the police Derek Chauvin, who knelt on Floyd's neck for almost nine minutes, when George Floyd said "I can not breath", the face of Derek Chauvin in the video is proud. FBI also are proud when they persecute me.
2. I wish the judge let me get asylum
3. I wish the judge order the U.S government guarantee my safety.
4. I wish the judge order FBI never persecute me.
5. I wish the judge order FBI never monitor me in any way, since I am afraid my privacy violated, my words be twisted and FBI persecute me. Besides, it is unjust to monitor me when I file a lawsuit to against them, since they can hear every words when I talk this case with friend or family or lawyer or other people and they can see my writing in laptop or iphone.
6. I wish the judge order FBI never steal from me.
7. I wish the judge order FBI never tell any other people my privacy in the future, like they do to Berners Lee family.
8. Compensation \$500,000, because FBI violate my privacy, persecuting me, let me live in hell. FBI let police force me to hospitals for one week, in the hospitals, the nurses did not let me to call lawyer and emotionally abused me, and I was forced to take medicines in a delicate way which I do not need to take. When I tried to get apology from Berners Lee, FBI told MIT police part of the whole story , and let them to against me. Because of their persecution, My heart beats too fast or abnormal, I was sent to emergence room on Feb 14th, 2020 because of chest pain. I will develop heart condition sooner or later if I continually live under FBI persecution. My brain always pain heavily like there is a pliers squeezing my head, I live in fear, sadness, angry. I can not study nomarly. I get a poor grade in spring semester 2020. I am worried that FBI monitor me, twist my words to

persecute me in the future. I was planed go to German to study, but my study plan not finished because of my health condition, the professor reject to write a reference letter for me, then my application not finished. I have to spent much time to pray every day. I usually go to Mass general hospital to see doctor. But when I told one of the doctor FBI think me as a potential spy and monitor me, and the doctor write down my words in the hospital website medical record, the next time I went to see another doctor, that doctor, who can read my medical record, treat me not good, she seems angry with me and rejected to give me my medicine I need. I am afraid I can not go to mass general hospital to see doctor. I am considering change hospital. I planed to see dentist in mass general hospital, but I may have to change to other hospitals and I have not find a dentist. FBI let me live in fear: I am afraid go to Chinese restaurants and Chinatown. When I go to Chinese restaurant or grocery store, I am always worried. When I am in my apartment, I still worry. For example, one night I heard there was sound outside, I was worried. When I went to my apartment to open my door, I worried because I do not know what I will see. I develop a habit to open light to sleep. Besides, I am worried about my parents' safety, I prayer many times and hope God bless them. Besides, when I find a lawyer for mit police sue me, I spent \$2500. When I went to California, the flight is $\$30+182+398=610$, rent is \$3500, the flight come back is $\$35+84+438=557$, the bill for emergence room on Feb 14th, 2020 is \$687.81. The EAD application fee \$410, The fee for file this lawsuit \$400, and fee for the lawyer for this lawsuit if I find a lawyer.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 6.5.2020

Signature of Plaintiff

Printed Name of Plaintiff

zhe Dong

zhe Dong

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address